Guidance for Industry

Instructions For Submitting Electronic Lot Release Protocols to the Center for Biologics Evaluation and Research

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the *Federal Register* notice announcing the availability of the draft guidance. Submit comments to Dockets Management Branch (HFA-305), Food and Drug Administration, 12420 Parklawn Dr., Rm. 1-23, Rockville, MD 20857. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

Additional copies of this draft guidance document are available from the office of Communication, Training and Manufacturers Assistance (HFM - 40), 1401 Rockville Pike, Rockville, MD 20852-1448, or by calling 1-800-835-4709 or 301-827-1800, or from the Internet at http://www.fda.gov/cber/guidelines.htm

For questions on the content of the draft document contact Deborah Parshall, Director of the Product Release Branch at PRB OCBQ CBER, HFM-235, 1401 Rockville Pike, Rockville, MD 20852 or e-mail parshall@cber.fda.gov or phone 301-594-6517.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Biologics Evaluation and Research (CBER)
May 1998

GD1

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Note: Page numbering may vary for documents distributed electronically.

Guidance for Industry[1]

INSTRUCTIONS FOR SUBMITTING ELECTRONIC LOT RELEASE PROTOCOLS TO THE CENTER FOR BIOLOGICS EVALUATION AND RESEARCH

I. Purpose

The purpose of this document is to provide instructions for the submission of the Electronic Lot Release Protocols to the Center for Biologics Evaluation and Research (CBER), Product Release Branch (PRB).

II. Background

In accordance with 21 CFR 610.2 (a), samples of any lot of licensed product, together with the protocols showing results of applicable tests, may at any time be required to be submitted to CBER for review and confirmatory testing. This document is intended to provide guidance to manufacturers. If any of these instructions are not followed, processing may be delayed. (Please note that in the Federal Register of December 8, 1995 (60 FR 63048), CBER announced that routine lot-by-lot release by CBER would no longer be required for licensed specified biologics [21 CFR 601.2 (c)] previously referred to as well-characterized therapeutic recombinant DNA-derived and monoclonal antibody biotechnology products. Companies affected by this change were notified in writing.)

III. General PDF File and Folder Format

General instructions for the construction of PDF files are discussed in Appendix A of CBER's *Guidance for Industry: Electronic Submissions of Case Report Forms (CRFs), Case Report Tabulations (CRTs) and Data to the Center for Biologics Evaluation and Research* (announced in May 1998). The following instructions are outlined in consideration of that guidance document.

A. Regulatory Reference

[1] This guidance document represents FDA's current thinking on electronic Lot Release Protocols. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. An alternate approach may be used if such approach satisfies the requirements of the applicable statute, regulation, or both. Please note that the FDA's use of specific products does not constitute an endorsement of those products.

As stated above.

B. File and Folder Organization

Electronic Lot Release submissions should be submitted to CBER's Product Release Branch. Each CD-ROM or diskette should contain a *cover.pdf* file with computer virus verification information as described in *Guidance for Industry: Electronic Submissions of Case Report Forms (CRFs), Case Report Tabulations (CRTs) and Data to Center for Biologics Evaluation and Research*, May 1998. Each lot release protocol should be provided as a single PDF file with its corresponding filename. The filename of the electronic protocol should appear on the protocol below the signature block.

Each new lot should be saved under a separate filename. The filename for each individual lot should be a sequentially derived number of eight digits with a two to three digit extension (i.e., 19980003.P0 for the third original protocol submission of 1998). Please note that the current format restricts the use of special characters.

The first four digits represent the year of the submission (e.g., "1998"). The next four digits represent the sequential submission number of that year. The extension (the three allowable characters, numbers or letters, following the period) represents the type of submission. For example, "P0" (zero) should designate original protocol. Each corrected protocol should be designated by using "PC" followed by the correction number (i.e., "PC1" for first corrected protocol, "PC2" for second corrected protocol, etc.). Thus, the first correction of the third original protocol submission of 1998 would be represented as "19980003.PC1." Using Acrobat Exchange, select the File "Save As" command. This should allow you to change the ".pdf" extension to ".P0" or ".PC". The Security option and passwords should not be used.

C. Document Information Fields

Using Acrobat Exchange, the general information fields for each electronic protocol should be filled in. The Document Information command is under the File menu.

a) Title: License/Product Code/Type of Lot[-B, -FC, -C]/Lot Number
b) Subject: Electronic Protocol Filename
c) Author: Name of the Manufacturer
d) Keywords: Leave blank

D. Table of Contents

Not Applicable.

E. Hypertext links and Bookmarks

Lot release protocols are typically 8-10 pages in length. Functional bookmarks should be sufficient to facilitate navigating the protocols. The Appendix shows an example of PDF bookmarks.

F. Indexing

No indexing is needed.

IV. Submitting Electronic Lot Release Protocols

Media Labeling. Physical labels should be attached to 3.5" Diskettes, CD-ROMs and CD-ROM jewel cases to provide visible identification. Each label should provide information sufficient to identify the item independent of any additional documentation. The following information should be included: the manufacturer name, the manufacturer license number, the submission date, product code(s), electronic protocol filename(s) and lot number(s) of the protocol(s) contained on the CD-ROM or the diskette. The Appendix has examples of labeled media.

Please consult the CD-ROM manufacturer before using felt-tip pens on CD-ROMs, as some pens contain dangerous solvents that may damage the CD-ROM.

Packaging and Shipping. Shipping differs for media and paper documents. CD-ROMs should be packaged carefully to ensure that they arrive in a usable condition. Particularly vulnerable are diskettes and jewel cases shipped in envelopes without bubble type protective material or stiff backing. The use of a "jiffy"-type bag by itself to ship media does not provide adequate protection for shipping electronic media.

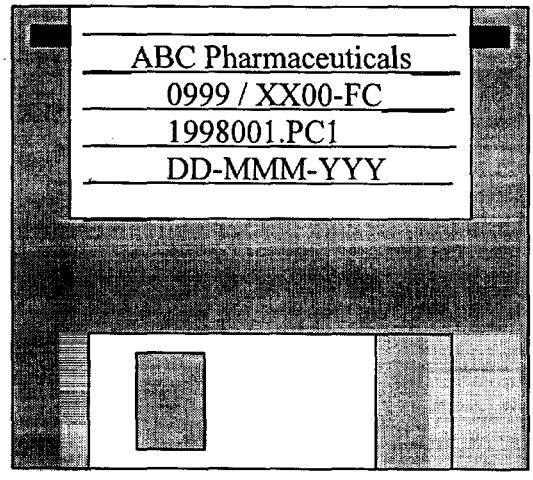
Delivery Address. Electronic protocol(s) can be sent with or without lot release samples to the following address:

Sample Custodian (ATTN: HFM-235)
Center for Biologics Evaluation and Research
Bldg: NLRC-B, Room: 113
5516 Nicholson Lane
Kensington, MD 20895

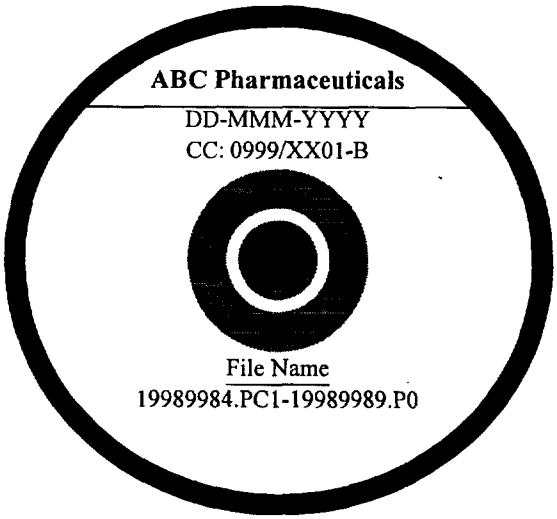
Prior to submitting a new electronic protocol please contact Deborah Parshall or Joseph Quander at the Product Release Branch at (301) 594-6517. The fax number is: 301-594-6924.

APPENDIX

1. **Sample 3.5" Diskette Label.** Use the writing space of the original diskette label ONLY. Please do NOT use oversize labels or put identifying information on the reverse side of diskette.



2. Sample CD-ROM Label.



A) Single Product Submission

B) Multiple Product Submission

C) CD Jewel Case, inside cover for Disk A

0999 ABC Pharmaceuticals
DD-MMM-YYYY
XX01-B

Lot #	Filename
8799795A	19989984.PC1
8799989B	19989985.P0
9567428C	19989987.P0
9567428D	19989988.P0
9567429K	19989989.P0

D) CD Jewel Case, inside cover for Disk B

0999 ABC Pharmaceuticals
DD-MMM-YYYY

Product Code	Lot #	Filename
XX01-B	8899989B	19989995.P0
XX01- B	8899995A	19989996.PC1
XX01-FC	ALT435A	19989994.P0
XY02-FC	9567418C	19989997.P0
XY02-FC	9567418D	19989998.P0
XY02-FC	9567419K	19989999.P0

3. Example of PDF bookmarks From an Electronic Lot Release Protocol.